



Tennessee Department of Environment and Conservation
Division of Water Pollution Control
L & C Tower Annex, 6th Floor
401 Church Street
Nashville, Tennessee 37243

RECEIVED

DEC 23 2010

JOHNSON CITY ENVIRONMENTAL
ASSISTANCE CENTER

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PURPOSE

The purpose of this Notice of Intent (NOI) is for a Tennessee city, county, utility district, university or military base to apply for NPDES permit to discharge stormwater runoff from a Phase II municipal separate storm sewer system.

INSTRUCTIONS

You must provide the following information to the Division of Water Pollution Control as application material. You may either submit a hard copy of the original NOI as described in sub-part 2.3 of the MS4 Permit, signed in accordance with the signatory requirements of sub-part 6.7 of the permit, and a copy of the NOI, to the address shown in sub-part 1.2 of the permit for the EFO responsible for the county where the facility is located; or you may submit by e-mail, with the completed NOI and attachments (such as map and city ordinances) to phase.two@tn.gov.

In addition, send an original, hard copy letter, signed by the responsible official of the MS4, which makes reference to the e-mail transmission including date and time that the electronic submitted was made. The letter must contain the signatory statement found on the NOI form. The letter must be mailed to the Nashville Central Office address as defined in sub-part 1.2 of the MS4 permit.

After completing the questions in each section, list the Best Management Practices (BMPs) that you will implement in each area based on a set of priorities you have identified in the area. Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

After completing the BMP's in each section provide the administrative information to complete those BMP's as explained here:

Primary Contact and Position/Title	The person in your organization serving as the primary contact.
Other Department and Roles	Other departments within your organization involved in the project and how their role is identified.
Other Government Entity and Roles	Identification of other government entities responsible for implementing one or more of the BMP's. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.
Other Institutions and Roles	Identification of partnerships with another MS4 operator or institution (e.g., Chamber of Commerce, environmental interest organizations, civic groups) to achieve the BMP's.
Target Groups (if applicable)	Specific kinds of groups that will be targeted, such as service industries (i.e., carpet cleaning), civic groups, schools, and church groups, etc.

PART I
ADMINISTRATIVE INFORMATION

Name of city, county, stormwater utility district or other public institution that operates a Phase II MS4: Johnson City, TN

<u>Jane Myron</u>	<u>Mayor</u>
Responsible Elected Official or Officer	Title
<u>200 W. Market Street</u>	<u>Johnson City</u>
Street Address	City
	<u>TN</u>
	State
	<u>37604</u>
	Zip Code

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PROGRAM CONTACT (Johnson City)

Phil Pindzola

Name

pwadmin@johnsoncitytn.org

Email Address

423-434-6080

Phone Number

PROGRAM CONTACT (ETSU)

Daniel O'Brien

Name

obriendj@etsu.edu

Email Address

423-439-7743

Phone Number

TECHNICAL CONTACT (Johnson City)

R. Andrew Best

Name

abest@johnsoncitytn.org

Email Address

423-975-2854

Phone Number

TECHNICAL CONTACT (ETSU)

R. Andrew Best

Name

abest@johnsoncitytn.org

Email Address

423-975-2854

Phone Number

☒ Attach an organizational chart that shows the different departments involved in stormwater management.

PART II
DESCRIPTION OF STORM SYSTEM

ITEM A
AREA SERVED (IN SQUARE MILES)

If city, town, university, or utility district: Give jurisdiction area within current corporate boundaries

42.7 sq mi

If city, town, university, or utility district: Give additional area of urban growth boundary

74.4 sq mi

If county: Give total area _____ Area unincorporated _____ Unincorporated, urbanized area (UA) _____

If county, indicate by checking the appropriate box if the permit will be used to regulate non-UA portions of your county:

Entire county (unincorporated)

☐

Non-UA portions, as follows (describe below)

☐

ITEM B
STORM DRAINAGE INFRASTRUCTURE

Give figures for the following features of stormwater drainage infrastructure owned or operated by the local government. For a county government, indicate whether the figures represent the entire county or only the urbanized area. Figures for length and number of culverts and catch basins may be rough estimates

For counties: Entire county ☐ Urbanized area only ☐

Storm Sewers 125 mi (est) + 22,000
ft (ETSU)

Open Ditches 72 mi (est) + 100
ft (ETSU)

Culverts 25 mi (est) + 50 ft
(ETSU)

Catch Basins 2500 (est) +
150 (ETSU)

Retention Basins 1 + 1 (ETSU)

Detention Basins 15 + 3 (ETSU)

ITEM C
MAPS

Please include a map or maps depicting the following information. A single map may be submitted, as long as the information is legible. If you are not able to provide all the information please mark the applicable check box and attach an explanation as to why the information has not been submitted:

Zoned areas for commercial or industrial activity

☐

Actual areas of commercial or industrial activity

☒

Other municipally owned/operated industrial activities

☐

State vocational, technical, college or universities

☐

Federal vocational, technical, college or universities

NA

City Roads

☐

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Municipal or County Wastewater Treatment Plants	<input type="checkbox"/>	County Roads	<input type="checkbox"/>	NA
Vehicle Fleet Maintenance Centers	<input type="checkbox"/>	Perennial and intermittent streams	<input type="checkbox"/>	
Power Plants	NA	Topography or Drainage Patterns	<input type="checkbox"/>	
Airports	<input type="checkbox"/>	Landfills	<input type="checkbox"/>	
Military Installations	<input type="checkbox"/>			

ITEM D
IDENTIFYING IMPAIRED STREAMS AND OTHER WATER BODIES

Using the GIS mapping tool (<http://tnmap.tn.gov/wpc/>) along with the most current 303(d) list published on the division's web site (<http://www.tn.gov/environment/wpc/publications/#wqassessment>), identify whether stormwater discharges from any part of the MS4 contribute pollutants of concern to an impaired waterbody and list below: For any impairment, indicate the waterbody ID#, name of impacted waterbody, nature of pollution (cause), and the source. If you have additional streams to list, please include in a separate attachment.

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	CAUSE OF IMPAIRMENT	SOURCE OF IMPAIRMENT
Boones Creek 006-1000	Nitrate+Nitrite Loss of biological integrity due to siltation Alteration in stream-side or littoral vegetative cover Escherichia coli	Discharges from MS4 area Pasture Grazing Land Development
Brush Creek 009-1000	Nitrate+Nitrite Loss of biological integrity due to siltation Other Anthropogenic Habitat Alterations Escherichia coli	Discharges from MS4 Area
Carroll Creek 006-0100	Nitrate+Nitrite Loss of biological integrity due to siltation Alteration in stream-side or littoral vegetative cover Escherichia coli	Discharges from MS4 area Pasture Grazing
Cash Hollow Creek 635-0100	Habitat loss due to alteration in stream-side or littoral vegetative cover E-coli	Discharges from MS4 Area
Cobb Creek 635-0200	Alteration in stream-side or littoral vegetative cover Loss of biological integrity due to siltation	Discharges from MS4 Area
Knob Creek 635-1000	Alteration in stream-side or littoral vegetative cover Nitrates Loss of biological integrity due to siltation E-coli	Discharges from MS4 area Pasture Grazing
Reedy Creek 061-1000	Nitrate+Nitrite Physical Substrate Habitat Alterations Loss of biological integrity due to siltation Escherichia coli	Discharges from MS4 area Pasture Grazing Channelization
Sinking Creek 046-1000	Escherichia coli	Discharges from MS4 area Pasture Grazing
Watauga River 008-1000	Undetermined Cause	Discharges from MS4 area Upstream Impoundment

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

ITEM E

HAS THE STATE OR EPA ISSUED A TMDL FOR ANY STREAMS DIRECTLY AFFECTED BY RUNOFF FROM YOUR MS4?

Determine whether or not a TMDL has been established and approved by EPA and identify by checking the appropriate box. A list of EPA-Approved TMDLs as well as EPA-Established TMDLs for Tennessee waters can be found on the division's web site (<http://www.tn.gov/environment/wpc/tmdl/approved.shtml>).

Yes ☒ No ☐ If yes, list the waterbody ID#, name of impacted waterbody and parameter(s) of concern:

WATERBODY ID# AND NAME OF IMPACTED WATERBODY	PARAMETERS OF CONCERN
Boones Creek 006-0100	E. coli / Siltation
Brush Creek 009-1000	Siltation
Carroll Creek 006-0100	Siltation
Cash Hollow Creek 635-0100	E. coli
Cobb Creek 635-0200	Siltation
Knob Creek 635-1000	Siltation / E. coli
Reedy Creek 061-1000	Siltation
Sinking Creek 046-1000	E. coli

If you have additional streams to list, please include in a separate attachment.

PART III

EXISTING LEGAL AUTHORITY TO CONTROL STORMWATER DISCHARGES TO MS4

You must review ordinances that are associated with stormwater discharges to your MS4. Attach a copy of ordinances that give your MS4 the authority to control stormwater discharges into the MS4 storm sewer system. Ordinances that deal with stormwater issues might be found, for example, in conjunction with litter control, prohibition of dumping, clean up of spills, grading/building permits, sewer connection ordinances, erosion and sediment practices, subdivision regulations or other land use/development ordinances.

(Go to next page.)

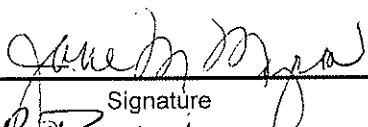
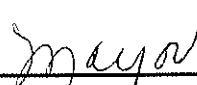
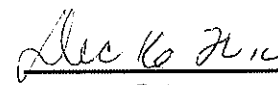

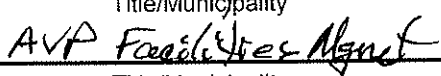
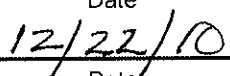
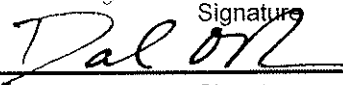
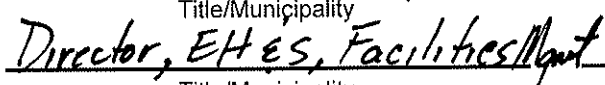
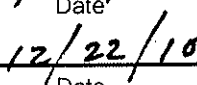
Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PART IV
SIGNATURE OF RESPONSIBLE CORPORATE OFFICER

This Notice of Intent (NOI) must be signed as follows: For a municipality, state, federal, other public agency, and/or co-permittees by either a principal executive officer or ranking elected official. For purposes of this section, a principal executive officer of a Federal agency includes one of the following:

- i. The chief executive officer of the agency.
- ii. A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

 _____ Signature	 _____ Title/Municipality	 _____ Date
 _____ Signature	 _____ Title/Municipality	 _____ Date
 _____ Signature	 _____ Title/Municipality	 _____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date
_____ Signature	_____ Title/Municipality	_____ Date

(Go to next page.)

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

PART V
YOUR PROPOSED STORMWATER QUALITY MANAGEMENT PROGRAM

This NOI requires you to provide a brief description of your current and proposed activities as well as your Best Management Practices (BMPs) for a stormwater management program. The following sections correspond to the six minimum control measures for a Phase II stormwater management program. If another MS4 will be responsible for implementing any or all portions of any or all following six minimum measures, then attach either the interlocutory agreement or the proposed agreement and schedule for adoption. You must still complete this NOI by answering the relevant questions for the six following measures.

For purposes of this NOI, the Public Education and Outreach and Public Participation and Involvement minimum measures have been combined.

SECTION 1
PUBLIC EDUCATION AND OUTREACH AND PUBLIC INVOLVEMENT/PARTICIPATION

A. Current Activities:

The following is a set of questions on your current Public Education and Outreach and Public Involvement/Participation. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

1. Does the municipality currently distribute educational materials on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the materials, including media used (e.g., written brochures, public service announcements, etc.); the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒

The City participates in Waterworks and public service announcements on a variety of topics are distributed on the City's behalf. The audience is the general public and numbers of people reached are documented through TAB (Tennessee Association of Broadcasters) reports. Dump-no-waste storm drain stamps are required for new development. Stamps are targeted towards residents and the general public. The City also supplies an EnviroScape (watershed model) for the Hands On! Regional Museum. The City also publicizes Household Hazardous Waste Collection days annually through a public service announcement. The City also accomplishes stormwater public outreach by a booth display at the Tennessee Environmental Conference. The City provides brochures on stormwater at the Tennessee Environmental Conference, City Hall and at the Public Works department (general, homeowners, construction, watershed).

No ☐

2. Does the municipality currently conduct or participate in public outreach activities focusing on the topics of stormwater quality, stream water quality, pollution impacts, pollution prevention, etc.? If yes, briefly describe the outreach activities, topic(s) covered, intended target audience(s), and the frequency of activities.

Yes ☒

The City provides public notice as required by law. The target audience is the general public and frequency varies based on need for public notice. The City participates in the Boone Watershed Partnership and participates in annual lake cleanups as part of that partnership. The City provides for the public to report illegal dumping, illicit discharges via a hotline advertised on its stormwater website.

No ☐

3. Does the current municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒

Notice of the readings and public hearing is given with the posting of City Commission Agenda on the Government Channel, on the local cable TV services. The meetings are regularly scheduled meetings held at 6:00pm on the first and third Thursday of each month. By having regularly schedule meetings, no advertisement of the meeting is required. Zoning Code changes require some additional public notice. For example, to change the zoning designation of a property, a sign must be posted a specific period before the Planning Commission meeting in which the rezoning request is considered. All property owners located within 200 feet of the boundary proposed for the zoning change is notified by U.S. Mail. The distance may vary according to the type of zoning being requested.

No ☐

B. Proposed Activities:

List the BMPs that you will implement in the areas of Public Education and Outreach and Public Participation and Involvement. These should be based on a set of priorities that you have identified in the areas of Public Education and Outreach and Public Participation and Involvement. Provide a short descriptive name to the BMP in the left column. In the right column, more fully describe the BMP.

For Public Participation and Involvement BMPs, you may not desire to dictate the ways in which the public participates or is involved in the stormwater quality management program; in this case, your proposed program should provide a forum and a structure by which to encourage or allow the public to participate. On the other hand, there may be specific ways you do want the public to be

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

involved, based on your program needs. For instance, you may want stream watch groups to be organized. As such, your proposed program should describe how you will accomplish this, and the time schedule.

PROPOSED BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION		
BMP	Name	DESCRIPTION
1A.	Continue Public Outreach and Education Program	Continue current public outreach and education program as required/defined by the first Small MS4 Permit and described in the City's latest Annual Report. Changes to the program will be made throughout the permit period as required by the current Small MS4 Permit and as indicated by the BMPs in this NOI.
1B.	PIE Plan Creation	Create PIE Plan, which focuses on priority areas, groups, and pollutants and includes specific goals and public information events and activities.
1C.	Implement PIE Plan	In accordance with PIE plan, implement public information events and activities. In accordance with permit requirements, PIE implementation will include outreach targeted at specific stream impairments within Johnson City watersheds and IDDE outreach (inform public employees, businesses and general public of hazards associated with illegal discharges and improper disposal of waste)..
1D.	Website	Implement a website to inform citizens of public outreach and involvement opportunities and provide basic information on stormwater pollution and pollution prevention.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted (e.g., service industries such as carpet cleaning, lawn care, civic groups, schools, church groups) if applicable:

University community will be targeted and university and university/community events will be used as forum for education and outreach, School children will be targeted as part of school outreach, developers, engineers and contractors to be targeted as part of impaired stream outreach for awareness of siltation and other impairments in specific watersheds, other target groups are to be determined as part of PIE Plan development.

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
PRIMARY CONTACT	POSITION OR TITLE
R. Andrew Best PE	Stormwater Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
ETSU	1b, 1c

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
ETSU	Portions of PIE Plan. MOU attached in Appendix III

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

SECTION 2
ILLCIT DISCHARGE DETECTION AND ELIMINATION

The following are common sources of illicit discharges to an MS4:

- | | |
|---|--|
| <ul style="list-style-type: none">• Sanitary Wastewater• Car wash wastewaters• Radiator flushing disposal• Spills from roadway accidents• Carpet cleaning wastewaters | <ul style="list-style-type: none">• Effluent from septic tanks• Improper oil disposal• Laundry Wastewaters/gray water• Improper disposal of auto and household toxics |
|---|--|

A. Current Activities

The following is a set of questions on your current Illicit Discharge Detection and Elimination Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STORM SEWER SYSTEM MAP

Does the municipality currently have a storm sewer system map completed for the entire regulated municipal separate storm sewer system? The map must depict, at a minimum: city streets, topography or drainage patterns, streams, and outfalls (points where the city or county-operated MS4 discharges into the streams or adjacent MS4s).

Yes ☒

No ☐

ILLCIT DISCHARGE ORDINANCES

1. Does the municipality currently have an ordinance or regulatory mechanism that prohibits non-stormwater discharges into the storm sewer system? If yes, please attach a copy of the ordinance and give page number(s) of this section of ordinance. If No, proceed to the next section (inspections and enforcement).

Yes ☒ No ☐

pg 71

Page Number

18-703 (2)

Ordinance Section Number

2. Does the ordinance or regulatory mechanism clearly define non-stormwater discharges, either through a written description of a non-stormwater discharge or through a listing of unallowable or allowable non-stormwater discharges?

Yes ☒

No ☐

3. Does the ordinance or regulatory mechanism allow right-of-entry on private property for inspection of suspected discharges?

Yes ☒

No ☐

4. Does the ordinance or regulatory mechanism prohibit dumping?

Yes ☒

No ☐

5. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to eliminate non-stormwater discharges in the event of violations? If yes, please note page number and paragraph number.

Yes ☒ No ☐

pg 74

Page Number

18-706 (3)

Paragraph Number

6. Does the ordinance or regulatory mechanism define penalties for violations? If yes, please note maximum penalty, page number and paragraph number.

Yes ☒ No ☐

\$5,000 per
day

Maximum Penalty

pg 74

Page Number

18-706 (3)
(f)

Paragraph Number

7. Does the municipality have ordinance or other regulatory mechanism that prohibits contamination of stormwater runoff from "hot spots" including industrial and commercial properties, restaurants, auto repair shops, auto supply shops, and large commercial parking areas?

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Yes ☒

No ☐

INSPECTION/SCREENING AND ENFORCEMENT PROCEDURES

1. Does the municipality presently have personnel and procedures in place for inspection and/or screening for non-stormwater discharges? If yes, please describe and indicate percentage of system inspected and/or screened.

Yes ☒
 No ☐

100% of the City's system has been screened for illicit discharges and eliminated all discharges that were found. ETSU system outfalls have not been screened but are to be inspected by ETSU and any found will be eliminated.

2. Does the municipality presently have procedures and personnel in place for enforcement of violations of the illicit discharge ordinance? If yes, please describe.

Yes ☒
 No ☐

All enforcement actions are handled by the Stormwater Manager with involvement from Code Enforcement and the City's Environmental Specialist (for sanitary sewer) issues as necessary.

3. How are enforcement actions documented?

Enforcement actions are documented in a City database by the Stormwater Manager.

4. Has the municipality defined "hot spots" for non-stormwater discharge screening and inspections? If yes, please describe and provide a map of illicit discharge screening hot spots.

Yes ☒
 No ☐

Hotspots are defined in the City's post-construction ordinance (Title 14, Chapter 3). The City has the authority to screen and inspect hotspot areas. However, hotspots are not currently screened for non-stormwater discharges, nor are they mapped.

PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place to receive and consider information and complaints about non-stormwater discharges that are submitted by the public? If so, provide brief description: responsible departments, personnel, steps followed.

Yes ☒
 No ☐

The City has a stormwater illicit discharges hotline, advertised on its website. Complaints and reports are handled by the City Stormwater Manager in Public Works. Complaints are documented and tracked in the City's database. The Stormwater Manager ensures that inspections and follow up removal are completed.

EDUCATION

1. Has the municipality educated the public and businesses including auto parts supply, auto repair shop and restaurants, regarding ways to detect, prevent and eliminate illicit discharges? If yes, briefly describe the educational materials, including media used (e.g., written brochures, public service announcements, etc.), the topic(s) covered, intended target audience(s), and the distribution method.

Yes ☒
 No ☐

The City uses public service announcements (PSAs) created by Waterworks for this education. The PSAs are distributed via television and focus on education of the general public. Topics include: keeping grass clippings out of waterways, limiting soil erosion, and the importance of vehicle maintenance and used oil recycling.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Illicit Discharge Detection and Elimination. These should be based on a set of priorities that you have identified in the area of Illicit Discharge Detection and Elimination. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR ILICIT DISCHARGE DETECTION AND ELIMINATION		
BMP	Name	DESCRIPTION
2A.	Continue current IDDE program	<p>The City will continue to implement the IDDE program, as required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI.</p> <p>On the ETSU campus, ETSU will be responsible for its own screening, tracking, and elimination of illicit discharges. ETSU will develop policies and procedures addressing illicit discharge detection and elimination. ETSU will enforce its policies and procedures to prevent and eliminate discharges. If ETSU requires enforcement assistance from the City, the City's enforcement will be</p>

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

		carried out only to the extent that State of Tennessee law allows a local jurisdiction to enforce local regulations on State of Tennessee properties. In the absence of enforcement by the City for discharges located on the ETSU campus due to this potential issue, TDEC will be called as the regulatory authority for State-owned properties.
2B.	Storm sewer system map maintenance	The storm sewer system map will be updated on an annual basis to reflect the addition or elimination of any system outfalls and inputs within the City and ETSU boundaries. The City's storm sewer system map does not currently include outfalls located on the ETSU main campus. Location and other relevant data for ETSU outfalls will be gathered during the permit period. This information will be kept with the City's storm sewer system map electronic files. Stormwater inputs, as defined by the current Small MS4 General NPDES Permit, are not currently included on the City's storm sewer system map. Data on stormwater inputs located within both MS4s will be collected and mapped during this permit period.
2C.	Outfall and hotspot dry weather screening	Screening/investigating all stormwater outfalls located within the small MS4 in accordance with the City's procedures for illicit discharge detection and elimination. This inspection will be documented in accordance with standard City procedure. Screening of outfalls located on ETSU property will be performed at the time that such outfalls are mapped by ETSU. Hotspots in both MS4s will be identified and mapped. A hotspot inspection protocol will be developed that defines the screening/inspection method, frequency and documentation format. A schedule for hotspot inspection/screening for the remaining permit period will also be included. Non-stormwater discharges identified during dry weather screening/inspections will be investigated in accordance with the City's investigation procedures and illicit discharge ordinance and/or State law, as appropriate for the jurisdiction where the discharge is identified.
2D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City and ETSU's illicit discharge detection and elimination program will be developed and implemented.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

the general public, residents, and owners of businesses located in hotspot areas

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR ILICIT DISCHARGE DETECTION AND ELIMINATION	
PRIMARY CONTACT	POSITION OR TITLE
R. Andrew Best PE	Stormwater Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE
Wastewater System Maintenance Staff	Identification and reporting of illicit discharges

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
ETSU	2d: elimination of illicit discharges on ETSU campus

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

ENTITY	BMP
ETSU	2d: elimination of illicit discharges on ETSU campus

**SECTION 3
CONSTRUCTION SITE STORMWATER RUNOFF PROGRAM**

A. Current Activities

The following is a set of questions on your current Construction Site Stormwater Runoff Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

CONSTRUCTION SITE RUNOFF ORDINANCES

1. Do the current ordinances/regulations for the municipal stormwater management program comply with Local, State and Federal public notice requirements? If yes, describe how the public is notified.

Yes ☒

No ☐

All ordinances and regulations must be formally adopted by the City Council during a meeting of the City Council, which is open to the general public. The ordinance/regulation is included on the agenda for the City Council meeting, and the agenda is available to the public. The meeting is advertised on the City website. The public has the opportunity to comment on the ordinance/regulation during the City Council meeting.

2. Do you currently have an erosion prevention and sediment control - or similar - ordinance or regulatory mechanism? If yes, include a copy and reference the page number(s). If No, proceed to the next set of questions below about construction site plans review.

Yes ☒

No ☐

Title 18, Page Number
Chapter 8,
page 76

3. Does the ordinance or regulatory mechanism require that site operators implement erosion prevention, sediment control, and other construction waste controls for land disturbance activities?

Yes ☒

No ☐

4. Does the ordinance/regulatory mechanism require (explicitly or implicitly) that controls be implemented for any land disturbances greater than or equal to one acre, or less than one acre if part of a large common plan of development or sale that would disturb one acre or more? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

pg 79 Page Number 18-803 (1) Paragraph Number
(b) and (c)

5. Does the ordinance or regulatory mechanism contain or reference technical standards for erosion and sediment control? If yes, note the page number and paragraph number where this is defined.

Yes ☒ No ☐

pg 80 Page Number 18-804 Paragraph Number

6. Do those technical standards meet or exceed the current effective Tennessee Construction General Permit (TNR100000) requirements for design storm and special conditions for impaired waters or exceptional waters?

Yes ☐

No ☒

7. Do those technical standards require that construction activities maintain temporary water quality buffers during construction?

Yes ☒

No ☐

8. Does the ordinance or regulatory mechanism clearly define the criteria - primarily who must submit - for submitting erosion and sediment control information or plans? If yes, note page number and paragraph number

Yes ☒ No ☐

pg 79 Page Number 18-803 (1) Paragraph Number
(b)

9. Does the ordinance or regulatory mechanism require approval by the local government prior to commencement of land disturbance activities? If yes, note page number and paragraph number.

Yes ☒ No ☐

pg 79 Page Number 18-803 (1) Paragraph Number
(b)

10. Does the ordinance or regulatory mechanism require re-submittal of erosion and sediment control information or plans if site plans or conditions change during land disturbance activities? If yes, note page number and paragraph number.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Yes ☒ No ☐ pg 87 Page Number 18-806 (2) (b) Paragraph Number

11. Does the ordinance or regulatory mechanism allow right-of-entry for government officials onto construction sites for inspections?
If yes, note page number and paragraph number.

Yes ☒ No ☐ pg 87 Page Number 18-806 (4) (a) Paragraph Number

12. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to STOP WORK in the event of non-compliance violations? If yes, note page number and paragraph number.

Yes ☒ No ☐ pg 88 Page Number 18-806 (5) (b) Paragraph Number

CONSTRUCTION SITE PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment construction for construction site runoff?

Yes ☒ No ☐

2. Does the technical review process require an erosion prevention and sediment control plan with appropriate BMPs?

Yes ☒ No ☐

3. Does the review process include a requirement for pre-construction meeting between the municipality and site developer, for priority construction sites, including at a minimum those construction activities discharging directly into, or immediately upstream of, waters the state recognizes as impaired or exceptional?

Yes ☒ No ☐

4. If there is a review process, provide a brief narrative or a flow chart of the process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

See Appendix IV for the Site Plan Review process.

RESPONDING TO PUBLIC INPUT AND COMPLAINTS

1. Does the municipality presently have procedures in place for receipt and consideration of information and complaints submitted by the public?

Yes ☒ No ☐

If Yes, please provide a brief narrative of the receipt process and procedures, describing process steps, responsible departments, and personnel (by title). If available, provide information on complaint tracking, documentation, etc:

Erosion and sediment control complaints are received by the Building Department and are then referred to the Stormwater Department. Complaints are entered into the Building Department software, BluePrince. The complaint, follow-up inspection(s), Notices of Violation, and resolution of complaints are tracked in the program. The Stormwater Manager conducts the inspections and any needed follow up for complaints on Commercial complaints. Building division handles residential complaints and the Engineering division handles complaints for public roads in subdivisions.

ENFORCEMENT AND INSPECTION PROCEDURES

1. Does the municipality presently have personnel and procedures in place for construction site runoff inspection?

Yes ☒ No ☐

2. Does the program provide for pre-construction meeting and monthly inspection of priority sites?

Yes ☒ No ☐

3. Does the municipality presently have procedures and personnel in place for enforcement to the maximum extent for violations of construction site requirements?

Yes ☒ No ☐

4. Does the municipality use a STOP WORK order to enforce non-compliance with construction site policies and requirements?

Yes ☒ No ☐

5. How are enforcement actions documented?

Enforcement actions are documented in BluePrince software by two (2) divisions (Codes and Stormwater).

TRAINING AND EDUCATION

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

1. Does the municipality presently make construction site runoff control training/information available to the public, developers, engineers, and contractors? (Be aware that the state of Tennessee regularly conducts erosion prevention and sediment control classes across the state. Local governments are encouraged to refer developers and contractors to these classes).

Yes ☒

No ☐

2. Has municipal staff completed state-sponsored training, including the Tennessee Fundamentals of Erosion Prevention and Sediment Control; and the Erosion Prevention and Sediment Control Design Course?

Yes ☒

No ☐

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of Construction Site Runoff Program. These should be based on a set of priorities that you have identified in the area of Construction Site Runoff Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM		
BMP	Name	DESCRIPTION
3A.	Continue the current construction site runoff management program	The Construction Site Runoff management program will continue to be implemented in the manner required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI. On ETSU property, the current construction site runoff program will continue to be implemented as is it currently implemented except that the City will receive development plans and will have opportunity for review and comment at the same time plans are sent to TDEC for review, rather than later in the development review process, as is current practice. The City currently inspects construction sites only when sediment is tracked onto City streets. However, the City will now inspect construction sites as it inspects other sites.
3B.	Construction site runoff ordinance update	The City's existing erosion and sediment control ordinance will be reviewed in light of the requirements of the small MS4 General NPDES Permit and the Tennessee Construction General Permit. Revisions will be made to correct any deficiencies identified during the review.
3C.	Construction site inventory	An inventory of all active public and private construction sites that result in a total land disturbance as defined in section 4.2.4 of the small MS4 General NPDES Permit will be developed and maintained. The inventory will contain relevant information for each construction site as defined in section 4.2.4.d of the small MS4 General NPDES Permit.
3D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City's construction site stormwater runoff control program will be developed and implemented.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Construction site owners and operators, City and ETSU construction site inspectors, and City construction site plan reviewers

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR CONSTRUCTION SITE RUNOFF PROGRAM	
PRIMARY CONTACT	POSITION OR TITLE
R. Andrew Best PE	Stormwater Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
None	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
ETSU	3a

SECTION 4
PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT
IN NEW DEVELOPMENT AND REDEVELOPMENT PROGRAM

A. Current Activities

The following is a set of questions on your current Permanent Stormwater Management in New Development and Redevelopment Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STRUCTURAL AND NON-STRUCTURAL STRATEGIES

1. Does the municipality currently have in place mechanisms or strategies to address permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more? For example, land use planning requirements, zoning directives, site-based local controls such as riparian buffer zone protection; storage or detention of stormwater prior to release to streams; practices to cause stormwater to percolate the soil rather than runoff immediately; vegetative practices.

Yes ☒

No ☐

If Yes, please provide a brief narrative of - and/or references to - the structural and non-structural strategies, describing strategies implemented, Best Management Practices allowed, technical guidance, responsible departments, and personnel (by title).

The City of Johnson City addresses permanent stormwater runoff management from new development or redevelopment projects that result in land disturbance of one acre or more through an ordinance that requires the implementation of water quality BMPs on each site. Each site is required to capture and treat a defined volume of water (called the water quality volume or WQv) to an 80% TSS removal standard. A Water Quality BMP Manual has been developed and implemented to support the requirements of the ordinance by defining the WQv and 80% TSS removal standard, providing detailed design requirements and calculation guidance, and providing detailed inspection and maintenance guidance/checklists for the BMP owner. The 80% removal standard is a presumptive standard, in that compliance with the standard is presumed to be achieved if the BMP is designed, constructed and maintained in accordance with the requirements and guidance of the ordinance and manual. The City provides compliance oversight of the 80% TSS removal standard at various key stages of the life of the BMP. Design compliance reviews are performed through City review and approval of stormwater BMP design plans, construction compliance reviews are performed through City inspection of stormwater (post-construction) BMPs on construction sites and through City approval of record drawings (i.e., as-built drawings) that are developed after construction is complete. Finally, maintenance compliance reviews are performed through regular inspection of each water quality BMP by City staff. The City's ordinance includes the authority to require BMP maintenance.

Permanent stormwater management for sites on the ETSU campus is treated in accordance with City regulations. The University is responsible for maintenance of permanent stormwater BMPs.

PERMANENT STORMWATER CONTROLS SITE MANAGEMENT ORDINANCE

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

1. Do you currently have an ordinance or regulatory mechanism that addresses permanent stormwater runoff management from new development and redevelopment projects? If yes, reference the page number in your ordinance. If No, proceed to the next section on permanent stormwater management plans review.

Yes ☒ No ☐ Page Number Title 14, Paragraph Number
 pg 4 Chap 3,
 all sections

2. Does the ordinance or regulatory mechanism require controls to mitigate pollutants in stormwater runoff? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page Number 14-304 (1) Paragraph Number
 pg 8 (a) and (b)

3. Does the ordinance or regulatory mechanism require (explicitly or implicitly) that controls be implemented for any new development or redevelopment projects greater than or equal to one acre, including projects less than one acre that are part of a large common plan of development or sale, that discharge into your small MS4? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page Number 14-304 (1) Paragraph Number
 pg 8 (a) and (3)
 (c) (i)

4. Does the ordinance or regulatory mechanism contain or reference technical standards for water quality controls (e.g., design of detention basins)? If yes, note page number and paragraph number.

Yes ☒ No ☐ pgs 10 and Page Number 14-304 (2) Paragraph Number
 11 (a) and (b)

5. Does the ordinance or regulatory mechanism clearly define the criteria for submittal -who must submit - of permanent stormwater management design information or plans? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page Number 14-304 (1) Paragraph Number
 pg 8 (a) and (3)
 (c) (i)

6. Does the ordinance or regulatory mechanism require approval prior to construction of permanent stormwater management controls? If yes, note page number and paragraph number.

Yes ☒ No ☐ Page Number 14-304 (1) Paragraph Number
 pg 8 (a)

7. Does the ordinance or regulatory mechanism require re-submittal of permanent stormwater management design information or plans if site plans change after the initial design has been approved? If yes, please note page number and paragraph number.

Yes ☒ No ☐ Page Number 14-304 (1) Paragraph Number
 pg 9 (b)

8. Does the ordinance or regulatory mechanism give the MS4 owner/operator the authority to penalize the owner of permanent stormwater management controls for violations? If yes, note page number and paragraph number.

Yes ☒ No ☐ pg 17 Page Number 14-302 all Paragraph Number

9. Does the ordinance or regulatory mechanism allow the municipality right-of-entry on property where permanent stormwater management controls are installed for inspections? If yes, please note page number and paragraph number.

Yes ☒ No ☐ pg 14 Page Number 14-307 (a) Paragraph Number
 and (b)

10. Does the ordinance or regulatory mechanism require that permanent stormwater management controls have adequate and long-term operation and maintenance? If yes, please note page number and paragraph number. If no, how does the MS4 owner/operator maintain permanent stormwater management controls?

Yes ☒ For permanent stormwater controls in the City of Johnson City, the regulatory mechanism under 14-307 (2) all

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

No ☐

requires long term operation and maintenance by owners. For controls on the ETSU campus, the University is the owner and operator maintaining permanent controls. Procedures for long-term maintenance will be developed under this permit.

11. Does the ordinance or regulatory mechanism require establishment and maintenance of water quality buffers in areas of new development and redevelopment?

Yes ☒

No ☐

PERMANENT STORMWATER MANAGEMENT PLANS REVIEW

1. Does the municipality presently have in place a technical review process (i.e. engineering department, planning department, zoning board) that evaluates new development and redevelopment with regard to the impact that permanent stormwater runoff will have on receiving streams?

Yes ☒

No ☐

If Yes, provide a brief narrative or a flow chart of the review process, describing the process steps, responsible personnel (by department, title and contact person), and criteria used for evaluation of information or plans that are submitted.

See Appendix IV for the Site Plan Review process.

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Permanent Stormwater Management Plans Review Program. These should be based on a set of priorities that you have identified in the area of the Permanent Stormwater Management Plans Review Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

PROPOSED BEST MANAGEMENT PRACTICES FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW		
BMP	Name	DESCRIPTION
4A.	Continue permanent stormwater management program	The permanent (post-construction) stormwater management program will continue to be implemented, as required/defined by the first Small MS4 General NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 General NPDES Permit and as indicated by the BMPs in this NOI. On ETSU property, the current permanent stormwater management will continue to be implemented as is it currently implemented except that the City will receive development plans and will have opportunity for review and comment. The City currently inspects construction sites and will continue to inspect construction sites as permanent stormwater controls are installed. ETSU maintains permanent stormwater controls of which it is the owner and will continue to maintain them. ETSU will carry out regular inspections of its own stormwater controls.
4B.	Update the water quality buffer requirement	The current City water quality buffer requirement will be reviewed in light of the requirements of the small MS4 General NPDES Permit. The requirement will be modified where necessary to align it with the conditions of the permit.
4C.	Update the permanent stormwater management performance standards and program tools	The current City performance standards, as defined in the post-construction ordinance and Water Quality BMP Manual, will be updated to include site design standards to meet the Runoff Reduction requirement of the Small MS4 General NPDES Permit. Standards for off-site mitigation and/or payment into a public stormwater project fund may or may not be included, as will be determined by the City during the course of this five year permit period. Other supporting elements of the City's program, such as project plan review and approval process, construction site/post-construction BMP inspections, owner/operator inspections and BMP maintenance tools will be modified as necessary to support the additional performance standards and requirements.
4D.	Enforcement Response Plan	An Enforcement Response Plan (ERP) for the City's permanent stormwater management program will be developed and implemented.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Developers/builders, water quality BMP owners

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR PERMANENT STORMWATER MANAGEMENT PLANS REVIEW	
PRIMARY CONTACT	POSITION OR TITLE
R. Andrew Best PE	Stormwater Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
None	

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
ETSU	4a (submission of plans)

**SECTION 5
POLLUTION PREVENTION/GOOD HOUSEKEEPING FOR MUNICIPAL OPERATIONS**

A. Current Activities

The following is a set of questions on your current Pollution Prevention/Good Housekeeping for Municipal Operations Program. These questions are intended to highlight minimum program requirements under the MS4 permit. For MS4s who have not been previously covered under an MS4 permit, each element not currently performed must be implemented by the dates identified in Sub-part 4.1.1. of the permit. Thus, each question with a "No" answer must be addressed with a solution in the MS4's proposed program.

STAFF EDUCATION AND TRAINING

1. Does the municipality's current operation and maintenance program provide annual training for staff on preventing and reducing stormwater pollution from activities such as park and open space maintenance, fleet and building maintenance, new construction and land disturbances, and stormwater system maintenance?

Yes ☒

No ☐

2. Are training activities documented? If yes, please describe training and method of record-keeping.

Yes ☒

No ☐

Annual half-day training is given for all pertinent staff and covers illicit discharge detection and elimination, pollution prevention and good housekeeping, and bi-annual training is taken by appropriate city staff in erosion and sediment control. The training is documented through a sign-in sheet. Employee training given for new employees includes good housekeeping video.
ETSU pertinent staff are trained in spill prevention, control and countermeasure, hazardous waste handling, management, and storage, pollution prevention, and in pest control application.

MUNICIPAL OPERATIONS POLLUTION PREVENTION

1. Does the municipality's operations and maintenance program have policies and procedures in place that address pollution prevention? If yes, please describe procedures. Consider the following in your response: maintenance activities, maintenance

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

schedules; long term inspection procedures for structural and non-structural stormwater controls to reduce floatables and other pollutants; controls for reducing or eliminating the discharge of pollutants from streets, roads, highways; controls for reducing or eliminating pollutants from municipal parking lots, maintenance and storage yards, fleet or maintenance areas with outdoor storage areas, salt/sand storage areas, snow disposal areas, waste transfer stations; disposal of waste removed from storm sewers and the areas listed above; and assessment of impacts on water quality from new flood management projects.

Yes ☒

The City has a general good housekeeping plan in place covering its operations and , which is updated as needed. The City has a covered salt storage facility. The City devotes at least two full-time staff to litter control and also obtains prison labor to supplement City staff efforts. Litter control covers right of ways along major roadways, the interstate and known problem areas. Other roads are covered on an as-needed basis. The City sweeps major roadways once every two weeks, while residential curbed streets are swept twice per year. The City sweeps ETSU roadways as requested by the University. The City washes light vehicles in an outdoor wash rack that is connected to the sanitary sewer and wash water is diverted from storm drains. City-owned projects are constructed in accordance with City construction site runoff and permanent stormwater runoff control ordinances.

No ☐

ETSU's pollution prevention and good housekeeping program will develop under the new permit, however, the University does have practices in place to control stormwater pollution, including holding Tennessee Multi-Sector General Permits for its powerhouse and implemented spill prevention and countermeasure BMPs.

MUNICIPAL INDUSTRIAL ACTIVITIES

1. Has the MS4 owner/operator obtained a Tennessee Multi-Sector General Permit or a no-exposure waiver for all qualifying municipal industrial activities? If yes, please give permit numbers or attach copies of the No-Exposure Certification form.

Yes ☒

No ☐

Brush
Creek
POT
W

Knob
Creek
POT
W

Regio
nal
POT
W

Permit Numbers(s) See Appendix V

2. List municipally-owned or operated facilities that have a notable potential for contaminating runoff: for example - vehicle maintenance garages; waste transfer operations; golf courses; salt or other materials storage; landfill. If more than one facility for a given type of operation; give the number of such facilities. Indicate if any of these are covered by an NPDES permit. Is there a documented pollution prevention plan in place for these facilities?

FACILITY OR TYPE OF OPERATION	NUMBER OF FACILITIES	IS ACTIVITY COVERED BY NPDES PERMIT?	IS A POLLUTION PREVENTION PLAN IN EFFECT?
City Garage	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Iris Glen Regional Landfill	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Parks with sports fields	3	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Golf Courses	2	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Cash Hollow Landfill (C&D, yardwaste)	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Salt storage	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Transit storage	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Golf Course (ETSU)	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Power house (ETSU)	1	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Motor Pool (vehicle washing) (ETSU)	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Hazardous Waste/Pesticide Storage Facility (ETSU)	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>
Salt Storage (ETSU)	1	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>
Athletic Fields (ETSU)	2	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>

B. Proposed Activities:

List the best management practices (BMPs) that you will implement in the area of the Pollution Prevention and Housekeeping Program. These should be based on a set of priorities that you have identified in the area of the Pollution Prevention and Housekeeping Program. Provide a short descriptive name to the BMP in the left column and more description in the right column.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

In addition to considering industrial-type operations, you must also consider municipal infrastructure, and related maintenance activities, maintenance schedules and long-term inspection procedures for structural controls and the proper disposal of waste from storm sewers/catch basins, etc. Also included in this program area is discharge of pollutants from roads and parking lots

PROPOSED BEST MANAGEMENT PRACTICES FOR POLLUTION PREVENTION AND HOUSEKEEPING		
BMP	Name	DESCRIPTION
5A.	Continue Pollution Prevention and good housekeeping Program	The City will continue to implement its pollution prevention and good housekeeping program, including staff training, as required/defined by the first Small MS4 NPDES Permit and as described in the City's latest Annual Reports. Changes to the program will be made throughout the permit period as required by the current Small MS4 Permit and as indicated by the BMPs in this NOI. ETSU will continue its current pollution prevention and good housekeeping practices for its own facilities.
5B.	Facility and Activities Review	The City will conduct a review of its facilities and activities to assess the effectiveness of current good housekeeping program and proximity to impaired waters. For gaps discovered during the review the City will implement necessary procedures and structures to prevent stormwater pollution. ETSU will conduct a review of its facilities and activities to assess the effectiveness of current good housekeeping program and proximity to impaired waters. For gaps discovered during the review ETSU will develop and implement necessary procedures and structures to prevent stormwater pollution. ETSU will prioritize changes for implementation during the permit cycle and develop a timeline for implementation of changes. ETSU will implement training for illicit discharge detection and elimination and pollution prevention and good housekeeping topics not currently covered in staff training.
5C.	New Facilities	The City will ensure that new facilities and projects for which the City is the owner comply with City construction and permanent stormwater ordinances. ETSU will ensure that new facilities and projects of which the University is the owner comply with City construction and permanent stormwater ordinances and ETSU construction and permanent stormwater control policies.
5D.	Flood Control Projects	The City will calculate water quality impacts of current flood control projects as compared to the requirements of its permanent stormwater control ordinance. The City does not have any flood control structures or facilities and thus cannot assess water quality impacts of flood control projects. For future potential flood control structures or facilities, ETSU will calculate water quality impacts as compared to the requirements of the City's permanent stormwater control ordinance and to ETSU's permanent stormwater control policies, if applicable.

If you have additional BMPs to list, please include in a separate attachment.

What specific groups will be targeted, if applicable?

Municipal and University staff

C. Measurable Goals and Implementation Milestones

Attached at the end of this NOI is an addendum to list BMP Measurable Goals and Implementation Milestones. You must complete the addendum, providing more details on the goals and milestones for each BMP outlined in this NOI.

D. Administrative Information

ADMINISTRATIVE INFORMATION FOR POLLUTION PREVENTION AND HOUSEKEEPING	
PRIMARY CONTACT	POSITION OR TITLE
R. Andrew Best PE	Stormwater Manager

Identify other Department(s) that will be involved and their role.

OTHER DEPARTMENT(S)	ROLE

Identify if you will partner with another MS4 Operator, or with another institution (e.g. Chamber of Commerce, Environmental interest organizations, civic groups) in order to carry out the chosen BMPs.

ENTITY	BMP
--------	-----

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

ETSU	5a Staff Training

Will another governmental entity be responsible for implementing one or more chosen BMPs? If so, identify the entity and which BMP(s) it will implement. Include a copy of the interlocutory agreement, or contract, or proposed agreement with execution schedule.

ENTITY	BMP
ETSU	5b through 5d for its own facilities and activities

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT
BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V., 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue Public Outreach and Education Program
Milestone Year 1	Continue program as described in BMP1A.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	No action.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	PIE Plan Creation.
Milestone Year 1	Develop Plan.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	No action.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Implement PIE Plan.
Milestone Year 1	No action.
Milestone Year 2	Implement TDEC-approved PIE Plan meeting goals, targets, and activities specified therein.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Website
Milestone Year 1- within 30 days of NOC	Within 30 days of coverage, implement website to inform citizens of public outreach and involvement opportunities and provide basic information on stormwater pollution and pollution prevention.
Milestone Year 2	Update website.
Milestone Year 3	Update website.
Milestone Year 4	Update website.
Milestone Year 5	Update website.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Detect and take steps to eliminate illicit discharges located within the MS4 by continuing the City's IDDE program.
Milestone Year 1	Continue
Milestone Year 2	Continue
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Update outfall data on the City storm sewer system map on an annual basis. 2. Update the City outfall map to include outfalls located on the ETSU main campus. 2. Identify and map inlets to the storm sewer system that are located in both MS4s, such that all inlets are included on the map by the end of Permit Year 5.
Milestone Year 1	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 1.
Milestone Year 2	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 2.
Milestone Year 3	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 3.
Milestone Year 4	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 4.
Milestone Year 5	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 5. Collect and map outfalls and inlets located on the ETSU main campus.
BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Perform dry weather screening for all outfalls such that all City and ETSU outfalls are screened at least once during the five year permit period. Investigate and take steps to eliminate non-stormwater discharges found during screening. 2. Identify and map hotspots in both MS4s. Develop hotspot investigation/screening protocol. 3. Perform investigation/screening for all hotspots. Take steps to eliminate non-stormwater discharges found.
Milestone Year 1	Screen outfalls. Identify and map hotspots.
Milestone Year 2	Screen outfalls. Develop hotspot investigation/screening protocol.
Milestone Year 3	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
Milestone Year 4	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
Milestone Year 5	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the co-permittee's IDDE programs. 2. Implement the IDDE ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's construction site management program under the authority of the City's erosion prevention and sediment control ordinance.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 1	Continue
Milestone Year 2	Continue
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise the City's existing erosion control ordinance to better align it with the requirements of the Small MS4 General NPDES Permit and the Tennessee Construction General Permit.
Milestone Year 1	Continue EPSC program using current City ordinance.
Milestone Year 2	Review and modify the ordinance. Adopt the revised ordinance.
Milestone Year 3	Continue EPSC program using revised City ordinance.
Milestone Year 4	Continue EPSC program using revised City ordinance.
Milestone Year 5	Continue EPSC program using revised City ordinance.
BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement the construction site inventory.
Milestone Year 1	Develop the construction site inventory.
Milestone Year 2	Implement the construction site inventory within 12 months of coverage under the small MS4 General NPDES Permit. Update the inventory as new construction sites are permitted and are completed.
Milestone Year 3	Update the inventory as new construction sites are permitted and are completed.
Milestone Year 4	Update the inventory as new construction sites are permitted and are completed.
Milestone Year 5	Update the inventory as new construction sites are permitted and are completed.
BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's construction site stormwater runoff program. 2. Implement the construction site stormwater runoff ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's permanent stormwater management program under the authority of the City's post-construction ordinance and with the guidance of the Water Quality BMP Manual.
Milestone Year 1	Continue
Milestone Year 2	Continue
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 4B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise the current water quality buffer requirements to comply with section 4.2.5.1 of the Small MS4 General NPDES Permit.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 4	No action.
Milestone Year 5	Revise post-construction ordinance and implement new requirements.
BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Update the City's current permanent stormwater management program to include requirements for Runoff Reduction. 2. Review and update other elements of the City's program as necessary to support new requirements for runoff reduction. Other elements include plans review and approval, construction site inspections, as-built requirements, BMP owner inspections, MS4 post-construction inspections, and maintenance requirements.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	Update City program to fully include and support Runoff Reduction requirements.
BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's permanent stormwater management program. 2. Implement the permanent stormwater management ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Review and revise ERP as deemed necessary to support program updates as indicated in BMPs 4A through 4F. Continue to implement ERP.

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue pollution prevention and good housekeeping Program
Milestone Year 1	Continue program, including staff training
Milestone Year 2	Continue program, integrating changes identified as a result of the review conducted under BMP 5B
Milestone Year 3	Continue program, including staff training
Milestone Year 4	Continue program, including staff training
Milestone Year 5	Continue program
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Facility and Activities Review
Milestone Year 1	No action
Milestone Year 2	Review facilities and document review and gap analysis. Identify recommended changes to facilities and activities.
Milestone Year 3	No action
Milestone Year 4	No action
Milestone Year 5	No action
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	New Facilities
Milestone Year 1	Develop checklist for documentation that projects comply with City construction and post-construction ordinances
Milestone Year 2	Implement checklist. Update checklist as necessary to include new requirements.
Milestone Year 3	Implement checklist. Update checklist as necessary to include new requirements.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 4	Implement checklist. Update checklist as necessary to include new requirements.
Milestone Year 5	Implement checklist. Update checklist as necessary to include new requirements.
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Flood Control Projects
Milestone Year 1	For any new proposed flood control project, calculate water quality impacts as compared to the requirements of its permanent stormwater control ordinance.
Milestone Year 2	Continue, as applicable
Milestone Year 3	Continue, as applicable
Milestone Year 4	Continue, as applicable
Milestone Year 5	Continue, as applicable

ETSU BMP's

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

ADDENDUM TO SMALL MS4 NPDES PERMIT NOTICE OF INTENT
BEST MANAGEMENT PRACTICES (BMPs) MEASURABLE GOALS AND MILESTONES

The purpose of this addendum is to record the measurable goals for each BMP, and the dates (month and year) by which interim actions are to be accomplished. Space is given for four BMPs for each of the six minimum measures. If necessary, please attach additional BMP MEASURABLE GOALS AND MILESTONES as a separate attachment.

Measurable goals are BMP design objectives, or goals that will quantify the progress of implementing the actions or performance of a BMP. They are ways to measure activities or effects of a BMP. For each of the six minimum measures and for each BMP, define the measurable goal you will use to monitor effectiveness of this BMP. The BMPs you list here should match exactly those given in Part V, 1-5 of this NOI. For purposes of this NOI, the Public Education and Outreach and Public Involvement/Participation minimum measures have been combined.

For each BMP, establish milestones for implementation. These tables are set up for once/year milestones. You may change the milestone dates to time frames less than one year.

BEST MANAGEMENT PRACTICES FOR PUBLIC EDUCATION AND PUBLIC PARTICIPATION	
BMP 1A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue Public Outreach and Education Program
Milestone Year 1	Continue program as described in BMP1A.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	No action.
BMP 1B	MEASURABLE GOALS AND MILESTONES
Goal(s)	PIE Plan Creation.
Milestone Year 1	Develop Plan.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	No action.
BMP 1C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Implement PIE Plan.
Milestone Year 1	No action.
Milestone Year 2	Implement TDEC-approved PIE Plan meeting goals, targets, and activities specified therein.
Milestone Year 3	Continue.
Milestone Year 4	Continue.
Milestone Year 5	Continue.
BMP 1D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Website
Milestone Year 1- within 180 days of NOC	Within 180 days of coverage, implement website to inform citizens of public outreach and involvement opportunities and provide basic information on stormwater pollution and pollution prevention.
Milestone Year 2	Update website.
Milestone Year 3	Update website.
Milestone Year 4	Update website.
Milestone Year 5	Update website.

BEST MANAGEMENT PRACTICES FOR ILLICIT DISCHARGE DETECTION AND ELIMINATION

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

BMP 2A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Detect and take steps to eliminate illicit discharges located within the MS4 by continuing the City's IDDE program.
Milestone Year 1	Continue
Milestone Year 2	Continue
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 2B	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Update outfall data on the City storm sewer system map on an annual basis. 2. Update the City outfall map to include outfalls located on the ETSU main campus. 2. Identify and map inlets to the storm sewer system that are located in both MS4s, such that all inlets are included on the map by the end of Permit Year 5.
Milestone Year 1	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 1.
Milestone Year 2	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 2.
Milestone Year 3	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 3.
Milestone Year 4	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 4.
Milestone Year 5	Update the storm sewer system map with new outfalls resulting from new development and redevelopment during Permit Year 5. Collect and map outfalls and inlets located on the ETSU main campus.
BMP 2C	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Perform dry weather screening for all outfalls such that all City and ETSU outfalls are screened at least once during the five year permit period. Investigate and take steps to eliminate non-stormwater discharges found during screening. 2. Identify and map hotspots in both MS4s. Develop hotspot investigation/screening protocol. 3. Perform investigation/screening for all hotspots. Take steps to eliminate non-stormwater discharges found.
Milestone Year 1	Screen outfalls. Identify and map hotspots.
Milestone Year 2	Screen outfalls. Develop hotspot investigation/screening protocol.
Milestone Year 3	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
Milestone Year 4	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
Milestone Year 5	Screen outfalls. Investigate/screen hotspots in accordance with hotspot protocol.
BMP 2D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the co-permittee's IDDE programs. 2. Implement the IDDE ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR CONSTRUCTION SITE RUNOFF PROGRAM	
BMP 3A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's construction site management program under the authority of the City's erosion prevention and sediment control ordinance.

**Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)**

Milestone Year 1	Continue
Milestone Year 2	Continue
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 3B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Revise the City's existing erosion control ordinance to better align it with the requirements of the Small MS4 General NPDES Permit and the Tennessee Construction General Permit.
Milestone Year 1	Continue EPSC program using current City ordinance.
Milestone Year 2	Review and modify the ordinance. Comply the revised ordinance.
Milestone Year 3	Continue EPSC program using revised City ordinance.
Milestone Year 4	Continue EPSC program using revised City ordinance.
Milestone Year 5	Continue EPSC program using revised City ordinance.
BMP 3C	MEASURABLE GOALS AND MILESTONES
Goal(s)	Develop and implement the construction site inventory.
Milestone Year 1	Contribute ETSU information to the City's construction site inventory.
Milestone Year 2	Contribute ETSU data to implemented inventory as new construction sites are permitted and are completed.
Milestone Year 3	Contribute ETSU data to implemented inventory as new construction sites are permitted and are completed.
Milestone Year 4	Contribute ETSU data to implemented inventory as new construction sites are permitted and are completed.
Milestone Year 5	Contribute ETSU data to implemented inventory as new construction sites are permitted and are completed.
BMP 3D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's construction site stormwater runoff program. 2. Implement the construction site stormwater runoff ERP.
Milestone Year 1	No action.
Milestone Year 2	Participate in development of ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP for ETSU campus.
Milestone Year 4	Implement ERP.
Milestone Year 5	Implement ERP.

BEST MANAGEMENT PRACTICES FOR PERMANENT (POST-CONSTRUCTION) STORMWATER MANAGEMENT PROGRAM	
BMP 4A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue to implement the City's permanent stormwater management program under the authority of the City's post-construction ordinance and with the guidance of the Water Quality BMP Manual.
Milestone Year 1	Continue designing and implementing projects on ETSU campus in accordance with City requirements. Ensure plans submitted to City and incorporate review comments as needed. During review of municipal activities under BMP 5B, review maintenance practices for permanent stormwater controls and incorporate maintenance procedures and policies into good housekeeping program as needed.
Milestone Year 2	Continue permanent stormwater management program.
Milestone Year 3	Continue
Milestone Year 4	Continue
Milestone Year 5	Continue
BMP 4B	MEASURABLE GOALS AND MILESTONES

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Goal(s)	Revise the current water quality buffer requirements to comply with section 4.2.5.1 of the Small MS4 General NPDES Permit.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	Participate in revisions to City post-construction ordinance. Implement new requirements for ETSU-owned projects.
BMP 4C	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Update the City's current permanent stormwater management program to include requirements for Runoff Reduction. 2. Review and update other elements of the City's program as necessary to support new requirements for runoff reduction. Other elements include plans review and approval, construction site inspections, as-built requirements, BMP owner inspections, MS4 post-construction inspections, and maintenance requirements.
Milestone Year 1	No action.
Milestone Year 2	No action.
Milestone Year 3	No action.
Milestone Year 4	No action.
Milestone Year 5	Update City program to fully include and support Runoff Reduction requirements.
BMP 4D	MEASURABLE GOALS AND MILESTONES
Goal(s)	1. Develop an Enforcement Response Plan for the City's permanent stormwater management program. 2. Implement the permanent stormwater management ERP.
Milestone Year 1	No action.
Milestone Year 2	Develop ERP within 18 months of coverage under the small MS4 General NPDES Permit.
Milestone Year 3	Implement ERP.
Milestone Year 4	Implement ERP.
Milestone Year 5	Review and revise ERP as deemed necessary to support program updates as indicated in BMPs 4A through 4F. Continue to implement ERP.

BEST MANAGEMENT PRACTICES FOR MUNICIPAL POLLUTION PREVENTION AND GOOD HOUSEKEEPING	
BMP 5A	MEASURABLE GOALS AND MILESTONES
Goal(s)	Continue pollution prevention and good housekeeping Program
Milestone Year 1	Continue current good housekeeping activities (such as compliance with spill prevention control and countermeasure plans), modify staff training as needed to incorporate stormwater topics
Milestone Year 2	Based on results of review conducted under BMP 5B, begin implementing changes to good housekeeping program. Integrate low cost items.
Milestone Year 3	Continue program, continue staff training. Integrate changes to program under timeline developed in 5B.
Milestone Year 4	Continue program, continue staff training. Integrate changes to program under timeline developed in 5B.
Milestone Year 5	Continue program, continue staff training. Integrate changes to program under timeline developed in 5B.
BMP 5B	MEASURABLE GOALS AND MILESTONES
Goal(s)	Facility and Activities Review
Milestone Year 1	Review facilities and document review and gap analysis. Identify recommended changes to facilities and activities. Categorize changes according to cost and priority. Develop timeline for implementation of changes.

Phase II Stormwater Permit Notice of Intent (NOI)
Phase II Municipal Separate Storm Sewer Systems (MS4)

Milestone Year 2	Develop procedures and policies for good housekeeping
Milestone Year 3	No action
Milestone Year 4	No action
Milestone Year 5	No action
BMP 5C	MEASURABLE GOALS AND MILESTONES
Goal(s)	New Facilities
Milestone Year 1	Develop checklist for documentation that ETSU projects comply with City construction and post-construction ordinances
Milestone Year 2	Implement checklist. Update checklist as necessary to include new requirements.
Milestone Year 3	Implement checklist. Update checklist as necessary to include new requirements.
Milestone Year 4	Implement checklist. Update checklist as necessary to include new requirements.
Milestone Year 5	Implement checklist. Update checklist as necessary to include new requirements.
BMP 5D	MEASURABLE GOALS AND MILESTONES
Goal(s)	Flood Control Projects
Milestone Year 1	For any new proposed flood control project, calculate water quality impacts as compared to the requirements of its permanent stormwater control ordinance.
Milestone Year 2	Continue, as applicable
Milestone Year 3	Continue, as applicable
Milestone Year 4	Continue, as applicable
Milestone Year 5	Continue, as applicable